

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

No. CR 10-318 MO

v.

**SECOND SUPERSEDING
INDICTMENT**

**DANIEL ARELLANO-VARGAS,
GABRIEL ARELLANO-VARGAS,
also known as "Javier",
GONZALO VARGAS-TORRES,
also known as "Papa",
also know as Moises Vargas Torres,
JOSE ARELLANO-VARGAS,
also known as "Sopilote",
LEONARDO VARGAS-ANGUIANO,
JUAN DIEGO AGUILAR VARGAS,
CHRISTINA CRYSTAL ELLINWOOD,
and
SASHANA SUNSHINE DOBOS,**

**21 U.S.C. § 841(a)(1), (b)(1)(A)(viii)
21 U.S.C. § 841(a)(1), (b)(1)(A)(vii)
21 U.S.C. § 841(a)(1), (b)(1)(B)(viii)
21 U.S.C. § 846
21 U.S.C. § 853
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 924(o)
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)**

Defendants.

THE GRAND JURY CHARGES THAT:

COUNT 1 (CONTROLLED SUBSTANCE CONSPIRACY)

Beginning on a date unknown to the Grand Jury and continuing up to November 10, 2010, in the District of Oregon, in the State of Washington, and elsewhere, **DANIEL ARELLANO-VARGAS, GABRIEL ARELLANO-VARGAS, GONZALO VARGAS-**

TORRES, JOSE ARELLANO-VARGAS, LEONARDO VARGAS-ANGUIANO, JUAN DIEGO AGUILAR VARGAS, CHRISTINA CRYSTAL ELLINWOOD, SASHANA SUNSHINE DOBOS, defendants herein, did knowingly and intentionally conspire and agree with each other, and others, both known and unknown to the Grand Jury to:

OBJECTIVES OF THE CONSPIRACY

- (1) Knowingly and intentionally manufacture marijuana, to wit: more than one-thousand (1000) marijuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vii).
- (2) Knowingly and intentionally distribute methamphetamine, to wit: more than fifty (50) grams of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(A)(viii).

WAYS AND MEANS OF CONSPIRACY

As part of this conspiracy, the above-named defendants and their co-conspirators obtained, maintained, and used vehicles to facilitate the manufacture of marijuana and the distribution of methamphetamine.

As part of this conspiracy, the above-named defendants and their co-conspirators obtained, maintained, and used phones to facilitate the manufacture of marijuana and the distribution of methamphetamine.

As part of the conspiracy, the above-named defendants and their co-conspirators obtained, maintained, and used premises to facilitate the manufacture of marijuana and the distribution of methamphetamine.

As part of this conspiracy, the above-named defendants and their co-conspirators acquired, possessed and transported supplies including tents, tools, food, chemicals and equipment and utilized individuals to manufacture marijuana.

As part of this conspiracy, **DANIEL ARELLANO-VARGAS, GABRIEL ARELLANO-VARGAS, GONZALO VARGAS-TORRES, and JUAN DIEGO AGUILAR VARGAS**, acquired, possessed, maintained, used and transported firearms in connection with their drug trafficking offenses.

All in violation of Title 21, United States Code, Section 846.

COUNT 2 (FIREARMS CONSPIRACY)

Beginning on a date unknown to the Grand Jury and continuing up to November 10, 2010, in the District of Oregon, in the State of Washington, and elsewhere, **DANIEL ARELLANO-VARGAS, GABRIEL ARELLANO-VARGAS, GONZALO VARGAS-TORRES, and JUAN DIEGO AGUILAR VARGAS** did knowingly and intentionally conspire and agree with each other, and others, both known and unknown to the Grand Jury to:

OBJECTIVES OF THE CONSPIRACY

- (1) Carry and use a firearm or firearms, during and in relation to the drug trafficking crimes set forth in Count 1, for which they may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Section 924(c)(1)(A).
- (2) Possess a firearm or firearms in furtherance of the drug trafficking crimes set forth in Count 1, for which they may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Section 924(c)(1)(A).

All in violation of Title 18, United States Code, Section 924(o).

COUNT 3 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about September 17, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 4 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about September 23, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 5 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about September 29, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute

five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 6 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about October 15, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT 7 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about October 28, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT 8 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about November 17, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 9 -(DISTRIBUTION OF METHAMPHETAMINE)

On or about December 17, 2009, in the District of Oregon, **DANIEL ARELLANO-VARGAS**, defendant herein, did knowingly and intentionally distribute

five (5) grams or more grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 10 -(MANUFACTURE OF MARIJUANA)

On or about July 25, 2010, **DANIEL ARELLANO-VARGAS, GABRIEL ARELLANO-VARGAS, GONZALO VARGAS-TORRES, JOSE ARELLANO-VARGAS, LEONARDO VARGAS-ANGUIANO, JUAN DIEGO AGUILAR VARGAS, CHRISTINA CRYSTAL ELLINWOOD, and SASHANA SUNSHINE DOBOS**, defendants herein, in the District of Oregon, did knowingly and intentionally manufacture more than 1000 marijuana plants, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vii).

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of the controlled substance offenses alleged herein, **DANIEL ARELLANO-VARGAS, GABRIEL ARELLANO-VARGAS, GONZALO VARGAS-TORRES, JOSE ARELLANO-VARGAS, LEONARDO VARGAS-ANGUIANO, JUAN DIEGO AGUILAR VARGAS, CHRISTINA CRYSTAL ELLINWOOD, and SASHANA SUNSHINE DOBOS**, defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any

property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation.

Upon conviction of the firearm offense alleged in Count 2, **DANIEL ARELLANO-VARGAS, GABRIEL ARELLANO-VARGAS, GONZALO VARGAS-TORRES, JOSE ARELLANO-VARGAS, and JUAN DIEGO AGUILAR VARGAS,** defendants herein, shall forfeit to the United States pursuant to Title 18, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearm and all ammunition involved in that offense.

Dated this 12 day of January 2011.

A TRUE BILL.

~~NAME~~ PRESIDING GRAND JUROR

Presented by:

DWIGHT C. HOLTON
United States Attorney

KATHLEEN L. BICKERS
Assistant United States Attorney